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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12
13 INTEL CORPORATION and APPLE INC.,

14 Plaintiffs,
15 v.

16 FORTRESS INVESTMENT GROUP LLC,
17 FORTRESS CREDIT CO. LLC, UNILOC
18 2017 LLC, UNILOC USA, INC., UNILOC
19 LUXEMBOURG S.A.R.L., VLSI
TECHNOLOGY LLC, INVIT SPE LLC,
INVENTERGY GLOBAL, INC., DSS
TECHNOLOGY MANAGEMENT, INC., IXI
IP, LLC, and SEVEN NETWORKS, LLC,

20 Defendants.

21 Case No. 3:19-cv-07651-EMC

22 **STIPULATION AND [PROPOSED]
ORDER SETTING PAGE LIMITS FOR
MOTION TO DISMISS AND STRIKE
BRIEFING**

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1 Pursuant to Civil Local Rule 7-12, plaintiffs Intel Corporation and Apple Inc. (collectively,
 2 “Plaintiffs”) and defendants Fortress Investment Group LLC, Fortress Credit Co. LLC, Uniloc
 3 2017 LLC, Uniloc USA, Inc., Uniloc Luxembourg S.a.r.l., VLSI Technology LLC, Inventergy
 4 Global, Inc., INVT SPE LLC, DSS Technology Management, Inc., IXI IP, LLC, and Seven
 5 Networks, LLC (collectively, “Defendants”) by and through their undersigned counsel hereby
 6 stipulate as follows:

7 WHEREAS, on November 20, 2019, Plaintiffs filed a 56-page Complaint asserting claims
 8 for violation of Section 1 of the Sherman Act, Section 7 of the Clayton Act, and Section 17200 of
 9 the California Business and Professions Code (Dkt. 1);

10 WHEREAS, Defendants intend to file motions to dismiss and strike Plaintiffs’ Complaint
 11 in accordance with the Court’s order setting an extended briefing schedule (Dkt. 75), and seek to
 12 coordinate their motion practice in order to reduce redundancy and total pages submitted to the
 13 Court;

14 WHEREAS, the parties have agreed, subject to Court approval, that: (i) all Defendants
 15 collectively will be entitled to 50 total pages for their motions to dismiss and strike moving briefs,
 16 which will likely be filed in a single joint brief plus one or more short supplemental briefs, (ii) all
 17 Plaintiffs collectively will be entitled to 50 total pages for their oppositions to these motions, and
 18 (iii) all Defendants collectively will be entitled to 30 total pages for their replies. The parties have
 19 further agreed that they may allocate the pages for their respective motions, oppositions, and
 20 replies however they choose;

21 WHEREAS, absent this stipulation, each Defendant would be entitled to file a motion to
 22 dismiss and strike of up to 25 pages, and Plaintiffs would be entitled 25 pages to oppose each such
 23 motion (L.R. 7-2, 7-3), which would result in potentially hundreds of pages of briefing on the
 24 motions to dismiss and strike;

25 WHEREAS, the requested page limits herein will allow the parties to coordinate their
 26 collective briefing and more efficiently present the motion to dismiss and strike issues to the
 27 Court;

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STIPULATION AND [PROPOSED] ORDER SETTING PAGE
 LIMITS FOR MOTION TO DISMISS AND STRIKE
 BRIEFING

Case No. 3:19-cv-07651-EMC

1 IT IS HEREBY STIPULATED AND AGREED by and between the parties, subject to the
2 Court's approval:

- 3 1. Defendants may have 50 pages collectively for their motions to dismiss and strike
4 Plaintiffs' Complaint to be allocated amongst Defendants however they choose;
- 5 2. Plaintiffs may have 50 pages collectively for their oppositions to Defendants'
6 Motions to be allocated among Plaintiffs however they choose;
- 7 3. Defendants may have 30 pages collectively for their replies to be allocated among
8 Defendants however they choose.

9 IT IS SO STIPULATED.

10 Dated: January 22, 2020

Respectfully submitted,

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Attorneys for Plaintiffs
INTEL CORPORATION and APPLE INC.

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ORDER
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4 Pursuant to stipulation, IT IS SO ORDERED.
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6 DATED: January 22, 2020
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The Honorable Edward M. Chen
United States District Judge